

## Exhibit B

1  
2 **UNITED STATES DISTRICT COURT**3 **FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**4  
5 IN RE: BABY FOOD PRODUCTS  
6 LIABILITY LITIGATION

7 Case No. 24-MD-3101-JSC

8 MDL 3101

9  
10 This document relates to:11 **PLAINTIFF'S PRESERVATION  
12 DISCLOSURE FORM**13 **ALL ACTIONS**14  
15 “You” refers to the person completing this Plaintiff Fact Sheet.

16 “Plaintiff” refers to the minor plaintiff bringing suit.

17 “Plaintiffs’ Parents” refers to the biological parent(s) or adoptive parent(s)/guardian(s)  
18 of Plaintiff.

19 “Guardian ad litem” refers to the court-designated representative of Plaintiff.

20 “ASD” refers to Autism Spectrum Disorder.

21 “ADHD” refers to Attention-Deficit Hyperactivity Disorder.

22  
23 Please provide an answer for each question and do not leave any answer space blank. If  
24 you do not know or cannot recall information required to answer a question, please  
specifically state either “Do not know” or “Cannot recall” in the response. If a question  
is not applicable to you, please specifically state that it “Does not apply.”

**Case Information**

1           **1. Provide the following information for the case Plaintiff, Plaintiff's Parent(s), or**  
 2           **Plaintiff's guardian(s) filed:**

3           Case Name: \_\_\_\_\_ Docket No.: \_\_\_\_\_

4           Plaintiff's Attorney: \_\_\_\_\_

**Food Purchasing Records**

5           **2. For commercial baby food that Plaintiff contends caused or contributed to his/her**  
 6           **injury, please provide the below-requested information. Please include on-line and**  
 7           **in-store locations, and grocery stores as well as stores where any food was purchased**  
 8           **that are not traditional grocery stores (such as drugstores, farmers' markets, and/or**  
 9           **multi-purpose stores like Target or Costco). This information is provided for**  
 10          **preservation purposes only and is not meant to be an exclusive or exhaustive list.**  
 11          **Rather, it is provided to the best of current recollection. Please add additional rows**  
 12          **to the below chart as needed or, alternatively, you can provide the names of**  
 13          **additional stores/websites on a separately included appendix to this Plaintiff Fact**  
 14          **Sheet:**

13 <b>Store/Website Name</b>	14 <b>Store/Website loyalty</b> 15 <b>account number and</b> 16 <b>associated phone</b> 17 <b>number</b>	18 <b>Payment</b> 19 <b>method(s) used</b> 20 <b>(credit/debit, cash,</b> 21 <b>check, WIC, etc.)</b>

22          **3. List the names of all credit card, debit card, or WIC/EBT accounts and their**  
 23          **associated numbers used at the stores listed in Response to Question 2 to purchase**  
 24          **commercial baby food that Plaintiff contends caused or contributed to his/her injury.**

25          \_\_\_\_\_

26          **4. Does Plaintiff, or Plaintiff's Parents have any receipts or other records of purchases**  
 27          **from any sellers identified in response to Question 2?**

28          \_\_\_\_\_ YES

YES          \_\_\_\_\_ NO

\_\_\_\_\_ UNSURE

1       **5. Does Plaintiff, or Plaintiff's Parents have credit, debit, WIC account, and/or banking**  
 2       **statements that show purchases from any sellers identified in response to Question 3**  
 3       **from Plaintiffs' birth to injury diagnosis?**

4

5       \_\_\_\_ YES       \_\_\_\_ NO       \_\_\_\_ UNSURE

6

7       **Photos and Video Records**

8       **6. Does Plaintiff, or Plaintiff's Parents have paper photos of Plaintiff from birth to**  
 9       **present?**

10

11       \_\_\_\_ YES       \_\_\_\_ NO

12

13       **Medical Records Information**

14

15       **7. Please provide the below requested information for all of Plaintiff's healthcare**  
 16       **providers from Plaintiff's gestation through present. These providers include**  
 17       **Plaintiff's parent's OB/GYN and/or midwife, any pediatricians, dentists, or other**  
 18       **medical providers for Plaintiff, any hospitals and/or clinics, and any individuals or**  
 19       **groups who have evaluated or provided treatment related to Plaintiff's physical,**  
 20       **developmental, psychological, behavioral and/or emotional well-being. Please add**  
 21       **additional rows to the below chart as needed or, alternatively, you can provide the**  
 22       **names of additional providers/institutions on a separately included appendix to this**  
 23       **Plaintiff Fact Sheet.**

15 <b>Provider/Institution</b>	16 <b>Business Address</b>	17 <b>Approximate</b> 18 <b>Dates of</b> 19 <b>Treatment</b>

24

25       **8. Does Plaintiff, or Plaintiff's Parents have any medical records or other documents**  
 26       **that document the care provided to Plaintiff by any person or entity identified in**  
 27       **response to Question 7?**

28

29       \_\_\_\_ YES       \_\_\_\_ NO       \_\_\_\_ UNSURE

30

31       **9. Has Plaintiff undergone testing for presence of or exposure to any heavy metal?**

32

33       \_\_\_\_ YES       \_\_\_\_ NO       \_\_\_\_ UNSURE

1           **If yes, please identify:**

2           a. The name, location, and date of the testing:

3           

---

  
4           

---

5           **10. Has Plaintiff participated in an investigative or other research trial relating to ASD**  
6           **or ADHD? \_\_\_\_\_ YES \_\_\_\_\_ NO \_\_\_\_\_ UNSURE**

7           **If yes, please identify:**

8           b. The name, location, and date of the research trial:

9           

---

  
10           

---

11           **11. Has Plaintiff, Plaintiff's Parent, or biological sibling of Plaintiff undergone genetic**  
12           **testing? \_\_\_\_\_ YES \_\_\_\_\_ NO \_\_\_\_\_ UNSURE**

13           **If yes, please identify:**

14           c. The name, location, and date of the testing:

15           

---

  
16           

---

### Educational Records

17           **12. Please provide the below requested information for all daycare facilities, preschools,**  
18           **schools, or other educational service providers for Plaintiff from birth to present.**  
19           **This includes any educational services provided as part of the assessment and/or**  
20           **treatment of Plaintiff's ASD and/or ADHD, including speech, occupational and/or**  
21           **behavioral therapy.**

22           **Please add additional rows to the below chart as needed or, alternatively, you can**  
23           **provide the names of additional institutions/service providers on a separately**  
24           **included appendix to this Plaintiff Fact Sheet.**

Name and Address of Institution/Service Provider	Approximate Dates of Participation/Attendance

*The above provided information is provided subject to a reasonably diligent investigation. The information provided in this disclosure is made for the sole purpose of allowing defendants to engage in preservation efforts without any admission of its discoverability or admissibility.*

Signature of Counsel for Plaintiff : \_\_\_\_\_

Date: \_\_\_\_\_